



Oregon

Kate Brown, Governor

Department of Environmental Quality

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December 30, 2016

Also Sent Via E-mail

Mr. Robert J. Wyatt
NW Natural
220 N.W. Second Avenue
Portland, OR 97209

**Re: Draft Gasco Groundwater Modeling Report
NW Natural “Gasco Site” and Northern Portion of the Siltronic Corporation
Facility
Portland, Oregon
ECSI Nos. 84 and 183**

Dear Mr. Wyatt:

The Oregon Department of Environmental Quality (DEQ) reviewed the “Gasco Groundwater Modeling Report, NW Natural ‘Gasco Site’” dated October 14, 2016 (Draft Model Report). The Draft Model Report describes the development, calibration, sensitivity analyses, and validation of a groundwater model designed to simulate the hydraulic influence of the Hydraulic Control and Containment (HC&C) system on the Fill water-bearing zone (WBZ) and the Upper Alluvium WBZ, Lower Alluvium WBZ, and Deep Lower Alluvium WBZ for the Gasco Site and northern portion of the Siltronic Corporation facility. Anchor QEA, LLC (Anchor) prepared the Draft Model Report on behalf of NW Natural.

NW Natural prepared and submitted the Draft Model Report subsequent to DEQ’s approval of the Revised Final Model Update Report¹ and a series of workshops with follow-up discussions and correspondence on model development, calibration, and validation that occurred from February 2015 through August 2016.

In addition to DEQ, the U.S. Environmental Protection Agency (EPA) reviewed the report. EPA’s comments are attached. DEQ concurs with EPA’s comments and considers them complete.

The primary purpose of this letter is to inform NW Natural that based on our review of the Draft Model Report, EPA and DEQ:

- Acknowledge the overall goals and objectives of the groundwater modeling work have been achieved; and
- Approve the report subject to NW Natural revising and resubmitting the document, and responding to the requests for information, consistent with the attached comments.

¹ Anchor QEA, LLC, 2014, “Revised Final Hydraulic Source Control and Containment System Groundwater Model Update Report - NW Natural Gasco Site,” dated August 22, a report prepared for NW Natural.

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DEQ requests that on or before January 31, 2017, NW Natural revise and resubmit the Model Report and provide the information requested.

Please contact me with questions regarding this letter or the attachment.

Sincerely,



Dana Bayuk
Project Manager
NW Region Cleanup Section

Attachment: EPA Comments

Cc: Patty Dost, Pearl Legal Group
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Pradeep Mugunthan, Anchor
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ECSI No. 84 File
ECSI No. 183 File